

**From:** [Walzer, Thomas](#)  
**To:** [Moore, Gary](#)  
**Subject:** RE: CES Chemical Spill Tables  
**Date:** Wednesday, November 12, 2014 10:14:45 AM  
**Attachments:** [removed.txt](#)

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Sorry missed this Email.



**Thomas Walzer**

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**From:** Moore, Gary [mailto:Moore.Gary@epa.gov]

**Sent:** Tuesday, November 11, 2014 5:09 PM

**To:** Walzer, Thomas

**Subject:** Re: CES Chemical Spill Tables

**Tom:**

**I think you answered the questions presented. In addition to the TCEQ Comments, I had comments as well that I sent to you guys on the actual table you sent to me. Did you look at my specific comments and make the requested modifications.**

**My suggestion on the PAH issue is to show them under SVOCs but maybe group all the PAHs together under a subheading PAHs. If you do the thing you are talking about with 3 and 4 methylphenol maybe you should put a footnote in to denote what you did. I am**

**not sure how that would impact the EPA Screening levels. On the waste samples, all that TCEQ meant was that they did not need to review anything because they not have any special data. On a side note, the EPA toxicologist indicated that he believes the only difference between the EPA and TCEQ values is that TCEQ used a 10-5 number rather than the EPA 10-6. Not sure how accurate that statement is but that is what he said.**

**I do think the CAS numbers should be shown since they have various names.**

**Please let me know that you addressed my specific comments.**

**Thanks**

**Gary Moore**

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**From:** Walzer, Thomas <[T.A.Walzer@WestonSolutions.com](mailto:T.A.Walzer@WestonSolutions.com)>

**Sent:** Tuesday, November 11, 2014 2:50 PM

**To:** Moore, Gary

**Cc:** Crow, David; [c.shappee@westonsolutions.com](mailto:c.shappee@westonsolutions.com); Thibodeaux, Denece

**Subject:** CES Chemical Spill Tables

Gary;

The differences in the TRRP values were we reported the TRRP 2012 values rounded to 3 significant digits. The 2012 tables were formatted to show 2 significant digits, however the tables did not use significant digits and our choice of 3 significant digits caused some apparent discrepancies. The TRRP 2014 tables were issued 10 September 2014 which rounds everything to 2 significant digits and so the numbers that appear on their tables are what they are actually using and not a value with hidden

decimal places. This was issued 7 days before we did the tables on the 17<sup>th</sup>. We have redone the tables using the 2014 TRRP to remove that discrepancy.

delta-BHC (CAS No. 319-86-8) is on the RBEL tables as "Delta hexachlorocyclohexane (HCH)" (CAS No. 319-86-8), I changed our table to list the compound as "delta-BHC (delta-Hexachlorocyclohexane (HCH))" to avoid confusion and will leave the comparison value. Alternate chemical naming systems do cause a bit of trouble. For other analytes where they commented on the name I added the name as it appeared on the RBEL list in parentheses as clarification. Should we in the future include the CAS numbers on these tables?

The 3&4-methylphenol is a mixed isomer and does not have a RBEL. We took the TCEQ comment as an instruction to use the RBEL for 4-methylphenol since that is lower than the RBEL for 3-methylphenol.

The comment identifying 2 analytes as PAH's and not SVOCs was not addressed as PAH's are usually considered subset of SVOCs. There are 100s of PAHs the attached EPA lists 28 (21 and 7 that are also priority pollutants). None of them are the two identified by the TCEQ comments: 1-Methylnaphthalene and 2-Methylnaphthalene. As an alternative we could just say Analytes by 8270. For the Waste analytical data the Comment from the TCEQ was "No TCEQ Standards or Levels included on this table." We did not use any TCEQ values because we did not know of any. Does the TCEQ have screening levels and want some of theirs added or is this just to signify they did not check and the reason why. Do they have screening levels want them added? what are they?



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